

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:
*The County of Summit, Ohio, et al. v. Purdue
Pharma L.P., et al.*
Case No. 18-op-45090

and

*The County of Cuyahoga v. Purdue Pharma
L.P., et al.*
Case No. 1:18-op-45004

MDL No. 2804

Hon. Judge Dan A. Polster

DECLARATION OF CHRISTOPHER K. EPPICH IN
SUPPORT OF DEFENDANTS' DAUBERT MOTION TO EXCLUDE THE OPINIONS
OF SETH B. WHITELAW

I, Christopher K. Eppich, declare as follows:

1. I am a partner at the law firm of Covington & Burling LLP and counsel to Defendant McKesson Corporation in this action.
2. I make this declaration to place before the Court certain materials relied on in Defendants' Daubert Motion to Exclude the Opinions of Seth B. Whitelaw.
3. Attached as **Exhibit 1** is a true and correct copy of excerpts from the report of Seth B. Whitelaw, dated April 15, 2019.
4. Attached as **Exhibit 2** is a true and correct copy of excerpts from the deposition testimony of Seth B. Whitelaw, dated May 16-17, 2019.

5. Attached as **Exhibit 3** is a true and correct copy of excerpts from the website of Whitelaw Compliance Group, LLC and is available at the following link:

<https://www.whitelawcompliance.com/commercial-pharmaceutical-compliance/>.

6. Attached as **Exhibit 4** is a true and correct copy of excerpts from U.S. Sentencing Commission, *Guidelines Manual*, Chapter 8 (Nov. 1991).

7. Attached as **Exhibit 5** is a true and correct copy of excerpts from U.S. Sentencing Commission, *Guidelines Manual*, Chapter 8 (Nov. 2004).

8. Attached as **Exhibit 6** is a true and correct copy of excerpts from the deposition testimony of James Rafalski, dated May 13, 2019.

9. Attached as **Exhibit 7** is a true and correct copy of the supplemental report of Seth B. Whitelaw, dated May 10, 2019.

10. Attached as **Exhibit 8** is a true and correct copy of excerpts from the deposition testimony of Thomas Prevoznik, dated May 17, 2019.

11. Attached as **Exhibit 9** is a true and correct copy of “Gov’t Standards Undermine Compliance Efforts in Life Science Companies,” which was published on March 7, 2018 in Attorney at Law Magazine by Seth B. Whitelaw.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 28th day of June 2019, in Washington, D.C.

/s/ Christopher K. Eppich
CHRISTOPHER K. EPPICH

CERTIFICATE OF SERVICE

I, Geoffrey E. Hobart, hereby certify that the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Geoffrey E. Hobart
GEOFFREY E. HOBART